



BOULT • CUMMINGS
CONNERS • BERRY PLC

Jon E. Hastings

(615) 252-2306

Fax (615) 252-6306

Email jhastings@boultcummings.com

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T.R.A. DOCKET ROOM

Honorable Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

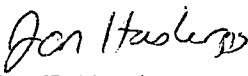
In Re: Implementation of the Federal Communications Commission's Triennial
Review Order (Nine-month Proceeding) (Switching)
Docket No. 03-00491

Dear Chairman Tate:

Enclosed please find the original and fourteen (14) copies of Sherry Lichtenberg's surrebuttal testimony filed on behalf of MCI metro Access Transmission Services, Inc. and Brooks Fiber Communications of Tennessee, Inc. (collectively "MCI") in the above-referenced docket. Copies have been served on all parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Jon E. Hastings

JEH/th

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2004 a copy of the foregoing document was served on the parties of record, via electronically, US mail or hand delivery:

Guy Hicks
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201

Charles B. Welch
Farris, Mathews, et. Al
618 Church St., #300
Nashville, TN 37219

Joe Shirley
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202

H. LaDon Baltimore
Farrar & Bates
211 Seventh Ave., N. #320
Nashville, TN 37219-1823

James Wright
United Telephone – Southeast
14111 Capital Blvd.
Wake Forest, NC 27587

Martha M Ross-Bain
AT&T Communications of the
South Central States, LLC
1200 Peachtree Street, Suite 8100
Atlanta, GA 30309

Ms. Carol Kuhnow
Qwest Communications, Inc.
4250 N. Fairfax Dr.
Arlington, VA 33303

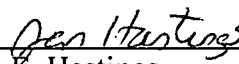
Henry Walker
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

Dale Grimes
Bass, Berry & Sims
315 Deaderick St., #2700
Nashville, TN 37238-3001

Mark, W. Smith
Strang, Fletcher, et al.
One Union Square, #400
Chattanooga, TN 37402

Nanette S. Edwards
ITC^DeltaCom
4092 South Memorial Pkwy
Huntsville, AL 35802

Guilford F. Thornton, Jr.
Stokes & Bartholomew
424 Church St., Suite 2800
Nashville, TN 37219-2386



Jon E. Hastings

SURREBUTTAL TESTIMONY OF SHERRY LICHTENBERG

On Behalf Of

MCIMETRO ACCESS TRANSMISSION SERVICES LLC

AND

BROOKS FIBER COMMUNICATIONS OF TENNESSEE, INC.

March 17, 2004

1 **Q. PLEASE STATE YOUR NAME, EMPLOYER AND TITLE.**

2 A. My name is Sherry Lichtenberg. I am currently employed by MCI as Senior
3 Manager, Operational Support Systems Interfaces and Facilities Development.

4 **Q. ARE YOU THE SAME SHERRY LICHTENBERG WHO PROVIDED**
5 **DIRECT AND REBUTTAL TESTIMONY IN THIS DOCKET?**

6 A. Yes.

7 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY IN**
8 **THIS PROCEEDING?**

9 A. The purpose of my surrebuttal testimony is to address the Rebuttal Testimony of
10 BellSouth witnesses Alphonso J. Varner and Gary Tennyson.

11 **Q. DOES BELL SOUTH PROVIDE EVIDENCE IN ITS REBUTTAL**
12 **TESTIMONY THAT ITS UNE-L ORDERING AND PROVISIONING**
13 **SYSTEMS CAN HANDLE MASS MARKET VOLUMES?**

14 A. No. As with its direct testimony, BellSouth focuses on its existing UNE-L
15 processes that currently handle low volumes of orders.

16 **Q. MR. VARNER CONTENDS AT PAGES 3-4 OF HIS REBUTTAL THAT**
17 **BELL SOUTH'S MANUAL HANDLING OF UNE-L MIGRATION TASKS**
18 **DOES NOT RESULT IN ERRORS AND DELAY. HOW DO YOU**
19 **RESPOND?**

20 A. BellSouth's performance data is of limited value because CLECs are not
21 submitting large volumes of UNE-L orders. Moreover, the three hot cut metrics
22 Mr. Varner refers to do not provide data on non-coordinated cutovers that MCI
23 would use for residential customers, and in any event only provide a small

1 window into the overall process, focusing on the hot cut itself and provisioning
2 troubles within seven days after the cutover.

3 **Q. AT PAGES 4-5 OF HIS REBUTTAL, MR. VARNER CONTENDS THAT**
4 **BELLSOUTH'S PERFORMANCE DATA REFUTE YOUR CONCERN**
5 **ABOUT INCREASED OUT OF SERVICE TIMES AND CUSTOMER**
6 **HARM. PLEASE RESPOND.**

7 A. As a preliminary matter, BellSouth's performance data only concerns the current
8 level of UNE-L circuits. Moreover, BellSouth's metrics only take into account
9 the BellSouth side of the equation. The fact that the circuit is "broken up"
10 between two carriers, going from BellSouth's facilities to the CLEC's collocation
11 and switch, could lead to greater outage times, which will not always be captured
12 by BellSouth's metrics.

13 **Q. IN MR. TENNYSON'S REBUTTAL AT P. 5, BELLSOUTH CONTENDS**
14 **THAT CLECS ARE SEEKING TO REQUIRE BELLSOUTH TO**
15 **IMPLEMENT ELECTRONIC LOOP PROVISIONING ("ELP"). IS MCI**
16 **SEEKING TO REQUIRE THE IMPLEMENTATION OF ELP?**

17 A. No. MCI has not taken a position on AT&T's ELP proposal in these proceedings
18 or anywhere else. MCI believes that automation can be introduced into the hot
19 cut process in phases, beginning with automating the ordering and tracking
20 processes via an on-line due date scheduler and tracking system similar to
21 Verizon's WPTS, and ending with upgrades to BellSouth's physical plant that
22 will allow for the automated unbundling of loops and cutovers. MCI has not,

1 however, proposed a wholesale upgrading of that network as a precondition to a
2 finding of no impairment.

3 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

4 **A. Yes, it does.**